

EXHIBIT 78

Declaration of Mary Cooper

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF MARY COOPER

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I, Mary Cooper, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am a Caucasian woman from Nashville, Tennessee.
2. My father was a representative in the U.S. House of Representatives. He also taught as an adjunct professor in the Owen School of Management at Vanderbilt University, teaching health care policy.
3. From eighth through twelfth grades, I attended a small, private boarding school in Massachusetts. There were 87 students in my graduating class.
4. As a senior in high school, I knew that I wanted to attend a large college or university, where I would have many different experiences and would be surrounded by classmates whose experiences had been different from mine. I also wanted to attend a school closer to Nashville.
5. My dad went to The University of North Carolina at Chapel Hill (“UNC-CH” or “Carolina”), so I filled out an application.
6. After I was admitted to UNC-CH, I spent a day on campus as part of a program for prospective students. I met many people and knew it was just a taste of what I would experience if I decided to go to college there. I also remember attending a session on the Carolina Southeast Asia Summer Program (“SEAS”), through which 25 rising sophomores have the opportunity to spend the summer in Southeast Asia. I was

excited to learn that the SEAS program really looked for students with different first-year experiences to form a well-rounded group of participants. I left eager to be a Tar Heel.

7. During my first two years as an undergraduate, UNC-CH felt like a big, brand-new place. I knew just one person when I was dropped off at Parker Residence Hall my freshman year, so I knew that I needed to develop a sense of community.

8. I joined Kappa Delta sorority and involved myself in different clubs and activities on campus, including women's rowing, Campus Y, and student government. I served on the Chancellor's Energy Task force where we encouraged the Chancellor to commit UNC-CH to ending its use of coal as a fuel for its cogeneration plant by 2020 and to make every possible effort to end its purchases of coal mined by mountaintop removal immediately. I also served as the co-chairwoman of HOPE Gardens, which employs Chapel Hill's homeless population and teaches self-sufficiency through growing food. These activities helped make the big campus feel smaller.

9. As I had hoped, I was selected for the SEAS program as a freshman and spent the summer of 2009 as a Summer Research Fellow at the National University of Singapore. My research focused on economics and immigration in Southeast Asia.

10. During the summer of 2010, I served as an intern in the White House. I assisted the First Lady, served as a point of contact for eight official trips in the District of Columbia, and wrote memoranda on meetings with dignitaries for East Wing staff.

11. In 2011, I was elected Student Body President. When campaigning, I learned so much by interacting with different affinity groups and talking with their members about their experiences and perspectives. Similarly, serving as Student Body

President allowed me to meet so many diverse people. Through these experiences, I was able to learn what the Carolina experience is like from many different points of view.

12. I graduated from UNC-CH in 2012 with a Bachelor of Science in Environmental Health Science.

13. After graduating from UNC-CH, I joined Teach for America and worked as a physics teacher at Wilmer Hutchins High School, an under-resourced public high school with many students from disadvantaged backgrounds in Dallas, Texas, from 2012 to 2014. I taught Physics and Advanced Placement Physics to 180 juniors and seniors. In 2013, the faculty at Hutchins High School voted me “Teacher of the Year.”

14. From 2014 to 2016, I worked for Deloitte as a consultant in Washington D.C..

15. In 2016, I returned to teaching. In 2016-17, I taught freshman algebra and geometry at a high school in Washington, D.C. I am currently teaching 8th grade math at a public charter school in Nashville, Tennessee.

The Impact and Importance of Diversity at UNC-CH

16. As a UNC-CH student, I was involved in diversity-related issues and activities from the very start. In both the academic and student government settings, I saw the positive impact that diversity had on my own experience and on the campus as a whole.

17. In the UNC Gillings School of Global Public Health, students often were encouraged to share personal experiences. In one instance, for example, a student who lived near a hog farm talked about the public health impact that hog farming had on his

family. Hearing different perspectives from other students in my biostatistics and epidemiology classes really pushed me to think about my own experiences in new ways. My education truly benefitted enormously from the diversity in my classes.

18. Learning about and promoting diversity as Student Body President also greatly enhanced my experience at UNC-CH. Campaigning for and serving in that role allowed me to meet so many diverse people and helped me to understand their perspectives. That understanding was crucial to my decision-making as a member of the Board of Trustees, especially with respect to issues like financial aid. I had many conversations with Shirley Ort, the former Director of the Office of Scholarships and Student Aid, about the Carolina Covenant and the value of keeping UNC-CH accessible. Thinking through issues like how to increase graduation rates for African-American students and how to help them succeed was important to me personally and also to the Board of Trustees.

19. In short, UNC-CH taught me the power of individual voices and perspectives. It is crucial that we support that diversity and also that we come together in our commonalities. I met many people at UNC-CH who did not look like me but who shared my love for Carolina and my desire to make it a better place. I learned that while we may be different, we have a lot in common.

20. UNC-CH has a long history of producing leaders. If you are going to be a leader in the world today, you have to have had diverse experiences or have supported the diversity of others. We do not operate in silos anymore. It is critical that leaders have the ability to engage and speak about issues. To develop that leadership ability, it is

important that students in the learning mindset have the chance to learn from different voices. A doctor needs to understand not only organic chemistry, but also the experience of those who he or she will encounter as patients. In the learning environment at UNC-CH, one can learn intentionally about diversity but also through random teamwork assignments in class. If there were a reduction in the diversity of the student body, those spontaneous opportunities to learn from peers would be negatively affected.

21. My experiences with diversity at UNC-CH and beyond have made me confident in my ability to work with, coach, and teach others who do not look like me or who have not had the same experiences. That confidence and that ability to connect with others have been critical in my role as a teacher. In one instance, I bonded with my students over our common love of pizza. One of my students had never had a white teacher before. “But when I saw you eating pizza,” he said, “I knew I could trust you.” He then brought ten of his friends to my classroom to ask questions about their physics homework.

22. Even though I do not teach in North Carolina, every wall in my classroom is decorated with something from UNC-CH, and I encourage my students of color to apply. I know that their presence would benefit students like me who had not experienced diversity before.

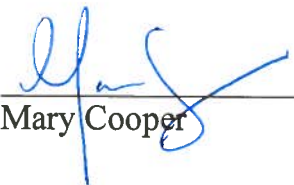
Conclusion

23. UNC-CH’s diversity is one of its greatest assets. The diversity I experienced enriched my education and made me a better leader. It was an honor to

serve a diverse population as Student Body President, and my experience at UNC-CH helped prepare me to teach and serve diverse populations.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: 10/13/2017



Mary Cooper